UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN NORTHERN DIVISION

UNITED STATES OF AMERICA.

Case: 1:21-cr-20332

Plaintiff,

Judge: Ludington, Thomas L.

MJ: Morris, Patricia T.

Filed: 05-19-2021

v.

INDI USA v. Lee Shacks (tt)

LEE LAMON SHACKS,

Violation:

18 U.S.C. § 922(g)(1)

Defendant.

INDICTMENT

U.S. DISTRICT COURT FLINT, MICHIGAN

THE GRAND JURY CHARGES:

COUNT ONE Felon in possession of a firearm 18 U.S.C. § 922(g)(1)

On or about February 18, 2021, in the Eastern District of Michigan, Lee Lamon Shacks, knowing he had been convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, one Smith & Wesson, Model M&P Shield EZ, .380 caliber, semiautomatic pistol, in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), upon conviction of any offense(s) in violation of Title 18, United States Code, Section 922(g), the defendant shall forfeit to the United States any firearms and ammunition involved in or used in the knowing commission of the offense(s).

THIS IS A TRUE BILL

Dated: May 19, 2021

<u>s/Grand Jury Foreperson</u>
GRAND JURY FOREPERSON

SAIMA S. MOHSIN Acting United States Attorney

ANTHONY VANCE Assistant United States Attorney Chief, Branch Offices

s/William J. Vailliencourt Jr.

WILLIAM J. VAILLIENCOURT, JR. Assistant United States Attorney

P39115

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Companion Case inforn	nation MUST be completed	d by Case: 1:21-c	r-20332	
United States District Cou Eastern District of Michiga		se (Judge: Ludin MJ: Morris, F		
NOTE: It is the responsibility of the	Assistant U.S. Attorney signing this fo	11011104	Lee Shacks (tt)	
Companion Case In	formation	Companion Ca	Companion Case Number:	
This may be a companion car	se based upon LCrR 57.10 (b)(4)	Judge Assigne	Judge Assigned:	
□ Yes	X No	AUSA's Initials	: WJV	
Case Title: USA v. Lee Lamon Shacks				
County where off	ense occurred: Saginaw		MAY 1 9 2021	
Check One: X Fe	elony Misdemeanor	□ Petty	U.S. DISTRICT COURT FLINT, MICHIGAN	
Indictm	· · · · · · · · · · · · · · · · · · ·	ased upon prior comp	laint [Case number:] d) [Complete Superseding section below].	
Superseding Case Ir	formation			
Superseding to Case No	o:	Judge:		
☐ Involves, for	rs; no additional charges or de plea purposes, different charge me subject matter but adds th	es or adds counts.	its or charges below:	
<u>Defendant</u>	<u>name</u>	<u>Charges</u>	Prior Complaint (if applicable)	
		United States Atto	rney is the attorney of record for	
the above captioned cas	se.			

Date: May 19, 2021

s/William J. Vailliencourt Jr.

William J. Vailliencourt Jr.

Assistant United States Attorney

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Attorney Bar #: P-39115

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.